

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER FOR APPOINTMENT OF A
SPECIAL MASTER

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

1 The Parties submit this Proposed Order pursuant to the Court's Order selecting a Special
2 Master, establishing the Special Master's authority, and establishing a protocol for raising
3 privilege disputes. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965,
4 Dkt. # 220. Accordingly, the Parties, and their respective counsel, hereby stipulate and agree,
5 and request an order establishing the following:

- 6 1. The Court APPOINTS the Honorable Elizabeth D. Laport (Ret.) as the Special Master
7 in these matters.
- 8 2. The Special Master will file a declaration under 28 U.S.C. § 455 confirming there are
9 no grounds for disqualification.
- 10 3. The Special Master's authority, and other provisions of the Special Master process,
11 are set forth in the Court's Order of July 7, 2025. Case No. 21-693, Dkt. # 381; Case
12 No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220.

13
14 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

15 DATED July 9, 2025.

Respectfully submitted,

16 HAGENS BERMAN SOBOL SHAPIRO LLP

17 By: /s/ Steve W. Berman

18 Steve W. Berman (WSBA No. 12536)

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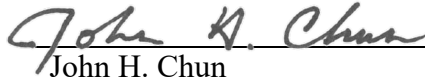
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1 IT IS SO ORDERED.

2
3 July 9, 2025

4 Dated



John H. Chun

United States District Judge